

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Large-Size First-Class Mail Presort Postcard

Docket No. MC2021-104

COMMENTS OF THE ASSOCIATION FOR POSTAL COMMERCE
(July 6, 2021)

Pursuant to Order No. 5926, the Association for Postal Commerce (“PostCom”) submits these comments on the Postal Service’s proposal to change the size limitations for presorted First-Class Mail postcards in Section 1110 of the Market Dominant Product List in the Mail Classification Schedule (MCS). The Commission should rule to approve the Postal Service’s request. Nevertheless, PostCom believes the Postal Service should provide clarification that any residual cards resulting from a qualified presorted mailing are allowed and are not required to pay the First-Class Mail Single-Piece letter rate.

The Postal Service’s Request Satisfies All Relevant Statutory Requirements

As indicated in the Postal Service’s Notice (page 1), Section 3682 of title 39 authorizes the Postal Service to establish size and weight limitations for mail matter in the market-dominant category of mail consistent with Commission regulations. The Postal Service is not claiming any price cap effect from the change, and the Service’s assertions that volume, revenue, and competitive impacts will be minimal appear to be credible.

Collaboration Between the Postal Service and its Customers

As explained in the Postal Service’s Notice, the instant request is the end-result of collaboration between the Postal Service and its customers. The proposed classification change will enable new and beneficial uses for First-Class Mail Presort cards. To the extent that the proposed changes result in increased use of First-Class Mail, or even help to stem decline in

demand for First-Class Mail, all users of the postal system will benefit. Importantly, the proposed change will not restrict current options in any manner, as current customers could either choose to send the larger First-Class Mail postcard or continue to send their current size postcards. *See* Notice at 3.

Additional Clarification is Needed in the Postal Service's Final Rules

In its Notice, the Postal Service has not clearly defined how single-piece residual cards would be treated. Production of bulk presort jobs routinely produce minimal quantities of pieces that do not qualify for presort rates. When producing its final rules, the Postal Service should allow for the provision of residual single piece postcards at the single piece postcard rate. In the absence of such a provision, residual pieces would presumably default to the much higher Single-Piece letter rate. The risk to mailers of having to pay the much higher letters might act as a deterrent to use of the large-sized cards, and the Postal Service should clarify qualification for the single-piece card rate to encourage adoption of the new format.

Summary

The Postal Service's proposal is the result of successful collaboration between the Postal Service and its customers. It will make First-Class Mail more attractive to commercial users and will not restrict users of existing formats in any way. As indicated above, PostCom believes the Postal Service should clarify how residual cards will be supported. With that relatively minor qualification, PostCom strongly recommends that the Commission approve the Postal Service's request.

Respectfully submitted,

/s/ Matthew D. Field

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